



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

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RUSSELL J. HARDING, Director

REPLY TO:

LABORATORY SECTION
DRINKING WATER & RADIOLOGICAL
PROTECTION DIVISION
3350 N MARTIN L KING JR BLVD
PO BOX 30270
LANSING MI 48909-7770

July 26, 1999

SUBJECT: Recent Developments in the Lab Certification Program

Several issues that have come up recently in the Laboratory Certification Program, and the most efficient way of addressing these issues is through this letter. If this proves to be an effective means of distributing information, similar letters may be sent out approximately twice a year in an effort to keep everyone up to date with developments in the drinking water certification program.

REPORTING CERTIFIED AND INFORMATIONAL RESULTS:

This office has been receiving numerous phone calls regarding laboratories that are allegedly reporting out results for parameters for which the lab lacks certification. This is a very straightforward issue that does not leave room for interpretation. A laboratory may not report out results for parameters for which it lacks certification unless one of the following two criteria are met:

1) The lab may run the analysis, however it must qualify the data with the following statement: **"This laboratory does not have certification for this parameter. These results are for informational purposes only and may not be used for compliance monitoring, or any other purpose that requires drinking water certification."**

Alternate language may be used, however it must first receive written approval from this office. Reports that contain both compliance and informational data are of particular concern. The report needs to clearly demonstrate which parameters the lab is, and those which it is not certified in. There will be greater latitude given for alternate language to those labs that are separating compliance and informational data into separate reports. In either case the data must be properly qualified in the report.

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2) A lab may report the data if the sample has been subcontracted to a certified lab. The report must clearly indicate that the analysis for the parameter in question was subcontracted. In addition, the report must clearly indicate the name of the lab that performed the analysis along with the lab ID # of the certified lab.

The parameters that a laboratory must be certified for are listed in the Manual for the Certification of Laboratories Analyzing Drinking Water, Fourth Edition. These parameters include all of the primary contaminants and the listed "Unregulated" contaminants. Although there is no MCL for the listed "Unregulated" contaminants, certification is required because these parameters are included in monitoring requirements. If a laboratory does not know if a parameter requires certification, it is the lab's responsibility to contact this office to find out.

Certified Laboratories that do not comply with these requirements are subject to decertification and/or civil/criminal penalties. Labs that are not certified and submit data requiring drinking water certification may be subject to civil and/or criminal penalties.

PT STUDIES:

The October PT data deadline is fast approaching. Laboratories will need to contact their vendor during the first half of August in order to get results to this office by the deadline. As discussed in this office's letter of December 15, 1998, PT testing will now be a requirement for maintaining certification for microbiology. The October PT will be the first required study for the micro labs.

I would like to thank all of the microbiology labs that participated in the voluntary study in April. This provided our program with very valuable information that should be shared with everyone. The overall failure rate was rather high when compared with the national average. Excluding labs that had obvious data reporting problems we had a failure rate of approximately 30%. Generally, a 10% failure rate or lower is average. After consulting with the PT providers to determine the cause of this high failure rate I learned that it is very common for States to have a high failure rate when starting a new PT program. Since we started with a voluntary PT, labs should be able to resolve their problems before their certification is affected.

It is highly recommended that laboratories carefully read the directions for both conducting the PT, and reporting the results. If a lab has questions regarding either of these issues, they should immediately contact their respective PT vendor. Several labs have commented that the instructions for the micro PT were not as clear as they could have been. I have contacted the PT vendors expressing this concern and they have provided assurance that they are working to make the instructions more clear. Please keep the comments coming!

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E-MAIL:

Finally, if you have an e-mail address we ask that you send it to us. Once we have compiled a list we will use it to send out notices. We will continue to use standard mail, but those with an e-mail address will receive this information sooner. My e-mail address is krisztig@state.mi.us

If you have questions regarding this information, please contact me at 517-335-8812.

Sincerely,

George L. Krisztian
Laboratory Certification Officer
Laboratory Section
Drinking Water and Radiological
Protection Division

gk/dc

cc: DWRP District Offices
County Health Departments
Michigan Certified Drinking Water Laboratories